REMARKS

Claims 1, 3-19 and 21-27 are pending in this application. By this Amendment, claims 1, 3-19 and 21-27 are amended. Claims 2 and 20 are canceled.

I.   THE CLAIMS DEFINE PATENTABLE SUBJECT MATTER

Claims 1-3, 6, 13, 14 and 26 are rejected under 35 U.S.C. §103(a) as unpatentable over U.S. Patent No. 5,913,185 to Martino et al.; and claims 4, 5, 7-12, 15-25 and 27 are rejected under 35 U.S.C. §103(a) as unpatentable over Martino, and further in view of Biber "The Multi-Dimensional Approach to Linguistic Analyses of Genre Variation". These rejections are respectfully traversed.

The applied art does not teach, disclose or suggest identifying a document type of a document in machine-readable form without structurally analyzing the document text by generating a cue vector from the text, the cue vector representing occurrences in the text of a first set of nonstructural, surface cues wherein the first set of cues includes a punctuational cue, as claimed in the independent claims.

Instead, Martino relates to a method of identifying a language shift point in a document that is written in a plurality of languages. Martino moves an interval through a document to calculate a probability that the text in the interval is written in a plurality of languages for that interval. Next, Martino assigns candidate languages within that interval, and a language shift point is identified.

Martino recognizes that language change is often accompanied by other changes in text, such as punctuation, capitalization, font change or paragraphs. Next, Martino refines the language shift points where the log of the language change points as determined by the crossover points. Next, a series of tests begin. That is, Martino discloses searching for punctuation such as a period, comma, or question mark is conducted. If any punctuation is found in the interval, its position is logged. The logged file is examined for the punctuation,

capitalization, font changes or paragraph changes which indicate where the language shift precisely occurred.

Accordingly, Martino does not teach, disclose or suggest the features of the independent claims. That is, Martino does not disclose <u>identifying</u> a document type without structurally analyzing the document text <u>by generating a cue vector</u> from the text with the cue vector representing occurrences in the text of a first set of cues, wherein <u>the first set of cues includes a punctuational cue</u>. In contrast, Martino discloses identifying punctuation which indicate where the language shift precisely occurred. The punctuation in Martino <u>does not</u> identify a document type.
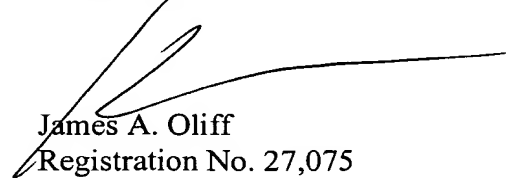
Biber does not make up for the deficiencies of Martino outlined with respect to the claims discussed above. Thus, Martino, alone and/or in combination with Biber, fails to anticipate or render obvious the subject matter of the claims. Withdrawal of the rejection of the claims under 35 U.S.C. §103 is respectfully solicited.

II. CONCLUSION

In view of the foregoing remarks, Applicants respectfully submit that this application is in condition for allowance. Favorable reconsideration and prompt allowance are earnestly solicited.

Should the Examiner believe that anything further is desirable in order to place this application in even better condition for allowance, the Examiner is requested to contact the Applicants' undersigned representative at the telephone number listed forth below.

Respectfully submitted,

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